

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CHINA PETROLEUM TECHNOLOGY &
DEVELOPMENT CORPORATION

Plaintiff

v.

PETROLEUM PRODUCTS &
SERVICES, INC. DBA WELLHEAD
DISTRIBUTORS INTERNATIONAL

Defendant.

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CASE NO. _____

COMPLAINT

Plaintiff, China Petroleum Technology & Development Corporation (“CPTDC” and/or “Plaintiff”), as and for its complaint against Petroleum Productions & Services, Inc. d/b/a Wellhead Distributors International (“WDI” and/or “Defendant”), alleges upon information and belief as follows:

THE PARTIES

1. CPTDC is a Chinese corporation with its principal place of business in Beijing, China.
2. WDI is a Delaware corporation with its principal place of business in Houston, Texas. It may be served with service of process on its registered agent, CT Corporation System, 350 N. St. Paul St., Dallas, Texas 75201.

JURISDICTION AND VENUE

3. This Court has jurisdiction over this matter pursuant to 28 U.S.C.A. § 1332 as the action is between a citizen or subject of a foreign state and a citizen of this state and the matter in controversy exceeds \$75,000.00, exclusive of interest and costs.

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a), since the Defendant has its principal place of business in Houston, Texas.

FACTS

5. CPTDC supplies oil field equipment to its customers in interstate and foreign commerce.
6. For the last several years, CPTDC has sold oil field equipment, including API 6A products, more generally described as wellhead equipment, to WDI pursuant to a trading agreement.

7. WDI currently owes CPTDC the sum of approximately \$14,662,000. It has failed to pay the amounts due despite demand. CPTDC files this suit to recover all amounts due.

8. As a result of WDI's failure to pay in accordance with its agreements, CPTDC has sustained damages in excess of the amount of the \$75,000.00 jurisdictional limit of this Court.

THEREFORE, CPTDC respectfully requests that judgment be entered against WDI in the amount of its damages, plus pre-judgment and post-judgment interest, together with attorneys' fees and such other relief as may be just and proper.

Respectfully submitted,

By: /s/ C. Henry Kollenberg

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